

**UNITED STATES DISTRICT COURT**  
**SOUTHERN DISTRICT OF NEW YORK**

CAROLINA TANJUTCO

Petitioner,

-against-

NYLife Securities LLC,  
 New York Life Insurance Company  
 Financial Industry Regulatory Authority, and  
 Securities and Exchange Commission

Respondents

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: 12/4/2023
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23-Civ-4889 (LTS)

**MOTION FOR ENTRY OF  
 SCHEDULING ORDER**

Respondents NYLife Securities LLC and New York Life Insurance Company (“New York Life”), move this Court for entry of an Order setting a schedule for the Respondents to file responses to the Amended Petition of Carolina Tanjutco. In support hereof, New York Life states as follows:

1. After conferring with the Petitioner and counsel for Respondents FINRA and the Securities and Exchange Commission, New York Life requests that the Court enter a Scheduling Order providing the Respondents forty-five days, until and including January 15, 2024 to respond to the Amended Petition, and that the Petitioner be granted forty-five days thereafter to file a Reply. As explained below, New York Life conferred with the Petitioner in good faith but was not able to reach an agreement.

2. Pursuant to the Court’s October 26, 2023, General Pretrial Management Order (Doc. 17), the Parties were required to jointly propose a briefing schedule on the Amended Petition within twenty-one days after all Respondents had been served.

3. New York Life was served on November 9, 2023. On November 18, 2023, counsel for New York Life contacted the Petitioner via email and suggested that Respondents be granted forty-five days from November 30, 2023, or until January 15, 2024, to file a response to the Amended Petition, and that the Petitioner be granted twenty-eight days thereafter to file a Reply.

4. Counsel for FINRA indicated that it agreed with this proposed schedule. Counsel for the Securities and Exchange Commission, which would normally be granted sixty days to file a response, also agreed with this schedule.

5. In response, Petitioner suggested that the Responses be filed within thirty days, or on December 30, 2023, because she is returning to the Philippines after the holidays. The Petitioner also requested that she be given an equal amount of time to file her Reply.

6. New York Life explained that filing a Response to the Petition on December 30 would be logistically challenging, given other year-end requirements and issues with client availability. New York Life also explained that the Petitioner would be served electronically with all Responses, so her physical location should not make a difference. New York Life advised the Petitioner that the parties needed to advise the Court of their position by November 30, 2023. New York Life also agreed to allow the Petitioner forty-five days to file her Reply.

7. Petitioner has not responded to New York Life's most recent communication. As a result, the parties have not been able to reach an agreement.

WHEREFORE, Respondents NYLife Securities LLC and New York Life Insurance Company request that the Court enter an Order allowing until and including January 15, 2024 for the filing of responses to the Petition, and that the Petitioner be granted forty-five days thereafter to file a Reply, or granting any other further relief the Court deems just and proper.

DATED: November 30, 2023

Respectfully submitted,

NYLIFE SECURITIES LLC and NEW  
YORK LIFE INSURANCE COMPANY,

By: /s/Christopher J. Murdoch  
One of its attorneys

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Application GRANTED. Respondents shall file their responses to the petition no later than **January 16, 2024**, and petitioner shall file her reply no later than **March 1, 2024**. SO ORDERED.



Barbara Moses  
United States Magistrate Judge  
December 4, 2023